

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

**NOTICE OF
MOTION**

-vs-

Civil Action No.: 05-CV-6482 (CJS)

NICHOLS GAS & OIL, INC., and
TOWNSEND OIL CORPORATION
d/b/a TOWNSEND OIL & PROPANE,

Defendants.

PLEASE TAKE NOTICE, that upon the attached attorney's declaration of James S. Wolford, Esq., dated July 9, 2008, and the proposed Order attached thereto, and all the pleadings and proceedings heretofore had herein, defendant Townsend Oil Corporation, d/b/a Townsend Oil & Propane (hereinafter "Townsend Oil"), by and through its attorneys, The Wolford Law Firm LLP, will move this Court for an Order, pursuant to Rule 5.4 of the Local Rules of the United State District Court for the Western District of New York: a) sealing all medical and mental health documents of the claimants; b) sealing all documents related to the Townsend Oil or Nichols Gas & Oil's (hereinafter "Nichols Gas") financial records; c) sealing Townsend Oil's Motion to Compel certain medical and mental health records (hereinafter referred to as "Motion to Compel") and any papers with exhibits filed in support of or in opposition to said Motion to Compel; and d) for such other further relief as the Court deems appropriate.

Dated: July 9, 2008

- 2 -

s/ James S. Wolford

James S. Wolford, Esq.

Jennifer L. Nuhfer, Esq.

THE WOLFORD LAW FIRM LLP

Attorneys for Defendant Townsend Oil

Corporation, d/b/a Townsend Oil & Propane

600 Reynolds Arcade Building

16 East Main Street

Rochester, New York 14614

Telephone: (585) 325-8000

e-mail: jwolford@wolfordfirm.com